

**COUNTY OF LOS ANGELES * FIRE DEPARTMENT
HEALTH HAZARDOUS MATERIALS DIVISION**

INSPECTION REPORT

7-14-11

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General Testing And Inspection Inc. 8427 Atlantic Ave Cudahy, CA 90201	FA0003683
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I-CONSENT: Consent to do inspection given by Pascale Saliba, Safety Manager, and William (Bruce) Byrd, Maintenance Manager.

NATURE OF BUSINESS: Non-Destruction Testing

II-WALK THROUGH:

Routine inspection conducted for Haz Waste and Tier Permitting; Haz Mat done by the Cal Arp Unit, as this is a Cal Arp site Facility specialized in performing Non-Destruction Testing for the military and the aerospace industry. Parts are mainly aluminum, stainless steel, and titanium. This is strictly a service company; there is no manufacturing.

Observed the following during the walk-through:

Magnetic Particle Testing Area:

- Parts are magnetized and sprayed with a florescent liquid solution (Magnaflux Oil) in a dark room to see if parts have cracks / imperfections. Per Mr. Byrd, the liquid solution is collected in a reservoir and continuously reused and added as necessary. Spent Mag Oil stored in a 55 gal drum outside of the dark room and properly managed as HW.
- After testing, some parts are cleaned with acetone and rags. Used rags are disposed as HW.
- The grinding room is directly next to the Magnetic Testing area. Minor grinding and sandblasting occasionally done to repair surface imperfections after testing. Informed operators that metal fines and spent blast media are considered HW and must be properly managed as such.
- Aqueous parts washer used outside of the dark room. Spent liquid removed as HW.
- Pressure testing rarely done nowadays. Per operator, this type of test is done once every 6-12 months. Nitrogen is used to conduct test, no other chemical used.

Penetrant Testing Area:

- Tests are done in two adjacent rooms; one room for large parts which penetrant oils are applied by hand and the other room has 3 lines where the parts are dipped into solution, test, rinse and dry in oven.
- Rinse waters from both rooms are pumped into a 1,000 gal holding tank at the treatment area where oily residues are separated from the water before discharge into the sewer.
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Radiography (X-Ray) Area:

- Three walk-in rooms and seven Turn-Table X-ray machines. Film processors located in a small room; processors connected to the silver recovery units. Silver recovery unit serviced "Intra-Met". After silver recovery, waste water is pump to the treatment tank.

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Ultrasonic Inspection:

- Parts are simply put into tanks of water and computer reading taken to see if parts have any cracks / imperfections. No HM used, no HW generated from this process.
- Large ultrasonic inspection machines located in the main building. Smaller units located in a small building by the HW storage area.

Acid Etching / Metal Surface Cleaning Area:

- This area is used to clean the parts to prepare them for inspection. There are two lines; Acid Etch Passivation and Chem Mill / Macro Etch. Per operators, the function of these lines is basically the same which is to clean the surface of the parts to be inspected. Only difference is the types and concentrations of the acids which are specified by the customers. This area is connected to AQMD permitted fumes scrubbers.
- Tanks are located within a berm which is maintained cleaned.
- Due to the quality of the parts being tested at this facility, the rinse waters at this area have to be maintained clean, so they are being continuously replaced. Rinse waters were observed to be very clear and ph reading show ph at 6.9. Rinse waters are sent to the holding tank to be ph adjusted if necessary before discharge into the sewer.
- Spent acid solutions are shipped out as is, without any treatment.
- Used rags stored in a cut up poly drum without any label. Directed operator to provide an approved container with a tight fitting lid for the storage of the used rags. Mr. Byrd stated used rags are disposed as HW. Discussed general HW management requirements with operators.

Waste Treatment Area:

- Treatment unit is currently permitted under PBR. Per Ms. Saliba, this facility used to be considered a PBR facility due to the treatment of chrome. Since 2005, after the change of ownership, facility no longer has any chrome waste. According to operators, the only waste stream being treated at this facility is the rinse water from the various processes that include rinsing. The influent waste water at the holding tank at the treatment area was analyzed for CAM 17 metals and fish bioassay recently and both results show influent waste water as non-hazardous.
- All rinse waters are sent to a 1,000 gal holding tank; another 1,000 gal tank used as a back up tank. Rinse waters from the penetrant inspection dept which contains oily residues are transferred to a sloped plate clarifier where oily residues are naturally separated from the water; no heat or chemicals are added, per operator. Oily residues from the clarifier are pumped out and manifested as a non-RCRA waste.
- Non-oily rinse waters are pumped into another tank where sodium hydroxide is added to raise the ph to satisfy LA County Sanitation discharge limit. There are various ph meters throughout the treatment area; meters read ph between 7-9.

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- Per Ms. Saliba, facility used to rinse empty containers before disposal which they stopped about a month ago. All containers are returned to product vendors or hauled off as is, without any rinsing.

Hazardous Waste Storage Area: Rear Yard

- Five 300 gal totes of various waste acids. None of the totes were properly labeled; one missing HW label, and the other ones having incomplete labels, missing generator information, contents, etc. Discussed HW labeling requirements with operators.
- Inspection of the area is not being done. Informed owner the requirement to conduct at least a weekly inspection of this area.

III-DOCUMENTS:

- CUPA, AQMD, and Industrial Waste permit OK.
- EPA ID #: CAD027897164.
- SB14 documentation not available for review. To be provided by reinspection date.
- Biennial Report not available for review. To be provide by reinspection date.
- Contingency plan OK.
- Training record OK; William Byrd, Maintenance Manager, HAZWOPER training, 5-6-11, Anthony Viramontes, Metal Treatment Dept Manager, HAZWOPER training, 3-11-11.
- Waste analysis results which show rinse water as non-hazardous; CAM 17 and fish bioassay OK.
- Manifests records OK. Manifests review show the following: 7-1-11. 330 gal of waste acid (nitric, hydrochloric acid), 330 gal of waste acid (phosphoric, nitric acid), 330 gal of waste acid (ferric chloride, nitric acid), manifest #:007861795JJK, by IDR Environmental Service, 3-17-11, 1000 lb of corrosive solids (iron scale), 50 gal of mag oil, manifest #:004415858FLE, by Industrial Waste Utilization Inc, 2-11-11, 5000 gal of waste corrosive (nitric, sulfuric acid), manifest #:004415747FLE, by Industrial Waste Utilization Inc, 1-27-11, 600 gal of waste corrosive liquid, manifest #:003919981FLE, by Industrial Waste Utilization Inc, 1-6-11, 55 gal of waste oil, 2000 lb of corrosive solid (iron oxide scale), manifest #003919833FLE, by Industrial Waste Utilization Inc, 1-6-11, 1925 gal of waste corrosive liquid, 275 of waste sodium hydroxide, manifest #:003919832FLE, 7-10-10, 3,500 gal of Non-RCRA haz waste liquid, (clarifier water), by Industrial Waste Utilization Inc.
- Forklifts serviced by Industrial Forklifts, out of Bell Gardens.
- Silver waste picked up by "Intra-Met".

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General Testing And Inspections Inc.

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IV-CLOSING CONFERENCE:

Discussed general observations from the inspection with the operators. Ms. Saliba provided a signed letter requesting consideration to be removed from TP permit due to the influent waste being treated is not hazardous to begin with and the oil/water separation process is a natural separation process, without the addition of heat or chemicals. Also, facility no longer rinses empty containers. Informed Ms. Saliba inspector will discuss this with supervision.

V. VIOLATIONS:

See NOV dated 7-22-11 for details.



COUNTY OF LOS ANGELES FIRE DEPARTMENT
HEALTH HAZARDOUS MATERIALS DIVISION
INSPECTION REPORT
CERTIFIED UNIFIED PROGRAM AGENCY • PARTICIPATING AGENCY
5825 RICKENBACKER ROAD, COMMERCE, CA 90040
PHONE: (323) 890-4107 FAX: (323) 724-5976



BUSINESS: General Testing And Inspection Inc.	OWNER: Mistras Group Inc.	DATE: 7-22-11
ADDRESS: 8427 Atlantic Ave, Cudahy, CA 90201		FACILITY ID: 0003683

The following requirements, if applicable, have been inspected. This document constitutes a summary of violations and notice to comply if the violation column (V) is checked. References: Titles 19 and 22 of the California Code of Regulations (CCR); Chapters 6.5, 6.67, and 6.95 of the California Health and Safety Code (HSC); Titles 11 and 12 of the Los Angeles County Code (Co Ord); and Title 40 Code of Federal Regulations (CFR). NOTE: For all CFR sections refer to CCR 66262.34(d)(2) for applicability.

INSPECTION TYPE: <input checked="" type="checkbox"/> INITIAL <input type="checkbox"/> RE-INSPECTION <input type="checkbox"/> OTHER:					
V	HAZARDOUS WASTE (HW) GENERATOR	SECTION	V	HAZARDOUS WASTE GENERATOR	SECTION
1	HW accumulation time	CCR 66262.34(a-d)	27	HW analysis retained for 3 years	CCR 66262.40(c)
2	Satellite accumulation	CCR 66262.34(e)	28	HW determination	CCR 66262.11
3 X	HW labeling	CCR 66262.34(f)	29	Proper disposal of HW	HSC 25189.5(a)
4	Hazardous materials storage and labeling	CCR 66261.2(f)	30	Reckless management of HW	HSC 25189.6
5	Containers leaking or not in good condition	CCR 66265.171 CFR 265.171	31	Quarantine order	HSC 25187.6
6	Compatibility of waste with containers	CCR 66265.172 CFR 265.172	32	Maintain/operate to prevent release/fire	CCR 66265.31 CFR 265.31
7	HW containers closed	CCR 66265.173(a) CFR 265.173(a)	33	Required equipment and maintenance	CCR 66265.32-.33 CFR 265.32-.33
8 X	Container inspection – weekly	CCR 66265.174 CFR 265.174	34	Required aisle space	CCR 66265.35 CFR 265.35
9	Separation of incompatibles	CCR 66265.177 CFR 265.177	35	Personnel training	CCR 66265.16 CFR 262.34(d)(5)(iii)
10	Tank overflow and spill prevention	CCR 66265.194 CFR 265.201(b)	36	Emergency information posting [SQGs]	CFR 262.34(d)(5)(ii)
11	Tank inspection	CCR 66265.195 CFR 265.201(d)	37	Contingency plan [LQGs]	CCR 66265.51
12	Tank system management	CCR 66265.190-.202 CFR 265.201	38 X	Source reduction requirements [LQGs]	CCR 67100.3
13	Empty containers	CCR 66261.7	39 X	Biennial report requirements [RCRA LQGs]	CCR 66262.40-.41
14	Used oil management	HSC 25250.4	40	Closure requirements [LQGs]	CCR 66265.111 / .114
15	Used oil / fuel filter management	CCR 66266.130 / HSC 25250.22	41	Site assessment requirements	HSC 25187(a)(1)
16	Used battery management	CCR 66266.81	42	Excluded recyclable material management	HSC 25143.2 / .9
17 X	Contaminated textile management	HSC 25144.6	43	Recyclable material report	HSC 25143.10
18	EPA ID number [submit DTSC form 1358]	CCR 66262.12	44	Universal waste management	CCR 66273.1
19	HW manifest complete	CCR 66262.23(a)	45	Other violation(s)	MC Sec 57.14.03
20	Manifest copies to DTSC	CCR 66262.23(a)(4)	V HAZARDOUS MATERIALS HANDLER SECTION		
21	Manifest copies retained for 3 years	CCR 66262.40(a)	50	HMBP established and implemented	HSC 25503.5
22	Consolidated manifest requirements	HSC 25160.2	51	HMBP submitted; updated/accurate	HSC 25505
23	Manifest exception reporting	CCR 66262.42	52	Regulated substance registration	HSC 25533(a)
24	HW transported with manifest	CCR 66262.20	V ABOVEGROUND PETROLEUM STORAGE SECTION		
25	HW transported by registered hauler	HSC 25163(a)	60	SPCC plan	HSC 25270.4.5(a)
26	Land disposal restriction requirements	CCR 66268.7(a)	70	PERMIT REQUIRED – Submit UP Forms	Co Ord 12.50.075

☐ NO SIGNIFICANT VIOLATIONS OBSERVED ON DATE OF INSPECTION.

☒ NOTICE TO COMPLY: THE VIOLATION(S) CITED MUST BE CORRECTED BY **8-22-11.**

☐ RETURN CERTIFICATION OF COMPLIANCE FOUND ON BACK OF THIS NOTICE.

Attention: The requirements checked are in violation. Non-compliance could result in re-inspection fees, permit revocation, and/or administrative/civil/criminal penalties. A re-inspection may occur at any time to verify compliance. Any time granted for correction of the violation(s) does not preclude any enforcement action by this Department or other agencies.

It is improper and illegal for any County officer, employee or inspector to solicit bribes, gifts or gratuities in connection with performing their official duties. Improper solicitations include requests for anything of value such as cash, discounts, free services, paid travel or entertainment, or tangible items such as food or beverages. Any attempt by a County employee to solicit bribes, gifts or gratuities for any reason should be reported immediately to either the County manager responsible for supervising the employee or the Fraud hotline at (800) 544-6861 or www.lacountyfraud.org. YOU MAY REMAIN ANONYMOUS.

#3. All hazardous wastes must be properly labeled with all the required information, including the generator's name & address, accumulation start date, and contents of the containers. Observed five 300 gal totes of various waste acids all improperly labeled; one was missing the hazardous

Inspected By: Gary To, HMS II	Consent Given By: William (Bruce) Byrd Pascale Saliba	Authorized Representative's Signature: US Mail
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INSPECTION REPORT
SUMMARY OF VIOLATIONS AND NOTICE TO COMPLY

BUSINESS: General Testing And Inspection Inc.	FA 0003683	DATE: 7-22-11
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waste label and the other totes having incomplete labels; missing generator's name and address, descriptions of the waste, etc.

#8. Hazardous waste containers and areas shall be inspected at least weekly for leaks, containers integrity, etc. Maintain inspection record. This was not available at time of inspection.

#17. Ensure contaminated shop rags are properly managed as hazardous wastes. Provide approved container with tight fitting lids for the storage of contaminated rags. And ensure container is properly labeled. Observed used rags stored in cut up container without covers and label.

#38. Provide Source Reduction Plan for year 2010 (SB 14 Requirement). This was not available at time of inspection.

#39. Provide Biennial Report (RCRA LQG). This was not available at time of inspection.

Inspected By: Gary To, HMS II	Consent Given By: William (Bruce) Byrd Pascale Saliba	Authorized Representative's Signature: US Mail
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COUNTY OF LOS ANGELES FIRE DEPARTMENT
HEALTH HAZARDOUS MATERIALS DIVISION
INSPECTION REPORT – TIERED PERMITTING
CERTIFIED UNIFIED PROGRAM AGENCY • PARTICIPATING AGENCY
5825 RICKENBACKER ROAD, COMMERCE, CA 90040
PHONE: (323) 890-4107 FAX: (323) 724-5976



BUSINESS: General Testing And Inspection Inc	OWNER: Mistras Group Inc.	DATE: 7-22-11
ADDRESS: 8427 Atlantic Ave, Cudahy, CA 90201		FACILITY ID: 0003863

The following requirements, if applicable, have been inspected. This document constitutes a summary of violations and notice to comply if the violation column (V) is checked. References: Title 22 of the California Code of Regulations (CCR) and Chapter 6.5 of the California Health and Safety Code (HSC).

INSPECTION TYPE: <input checked="" type="checkbox"/> INITIAL <input type="checkbox"/> RE-INSPECTION <input type="checkbox"/> OTHER:					
V	ALL TREATMENT TIERS	SECTION	V	CONDITIONALLY AUTHORIZED / PERMIT BY RULE	SECTION
100	Determine tiered permit eligibility for treatment of hazardous waste	[CE] HSC 25201.5 [CA] HSC 25200.3 [PBR] CCR 67450.11	120	Post a sign reading: "Danger Hazardous Waste Area – Keep Out". Control access to entry point at all times.	[CA] HSC 25200.3(c)(1) [PBR] CCR 67450.3(c)(9)(A)
101	Submit Unified Program notification forms for hazardous waste treatment	[CE] HSC 25201.5(d)(7) [CA] HSC 25200.3(e)(1) [PBR] CCR 67450.3(c)(1)	121	Comply with applicable requirements for secondary containment in the treatment area.	[CA] HSC 25200.3(c)(4) [PBR] CCR 67450.3(c)(9)(E,F)
102	When changes occur, submit amended UP notification forms	[CE] HSC 25201.5(i) [CA] HSC 25200.3(k) [PBR] CCR 67450.3(c)(2)	122	Submit the tiered permitting Phase I Environmental Checklist. (DTSC form 1151)	[CA] HSC 25200.14(b)(1) [PBR] CCR 67450.7(2)
103	TP unit verification	[CE] HSC 25201.5(d)(9) [CA] HSC 25200.3(f) [PBR] CCR 67450.3(c)(9)(A)	123	Submit Certification of Financial Assurance form, including a written estimate of closure costs.	[CA] CCR 67450.13(a) [PBR] CCR 67450.13(a)
104	Treat eligible waste streams using authorized treatment methods.	[CE] HSC 25201.5(a) [CA] HSC 25200.3(a) [PBR] CCR 67450.3(c)(4)	124	Adjust the closure cost estimate for inflation by March of each year.	[CA] CCR 67450.13(a)(2) [PBR] CCR 67450.13(a)(2)
105	Prepare and maintain a written inspection schedule and log of inspections conducted.	[CE] HSC 25201.5(d)(4,5) [CA] HSC 25200.3(c)(5) [PBR] CCR 67450.3(c)(8)(B)	130	PERMIT BY RULE	SECTION
				Label the exterior of each fixed treatment unit.	[PBR] CCR 67450.3(c)(7)
106	Tank and container management standards met	[CE] HSC 25201.5(d)(9)(e)(1) [CA] HSC 25200.3(c)(4) [PBR] CCR 67450.3(c)(9)(E,F)	131	X Prepare and maintain written operating instructions	[PBR] CCR 67450.2(b)(3)(G)
107	Other violation(s)		132	Provide a waste analysis plan.	[PBR] CCR 67450.3(c)(8)(A)
	CONDITIONALLY EXEMPT / CONDITIONALLY AUTHORIZED	SECTION	133	Submit annual notification forms.	[PBR] CCR 67450.3(c)(1)
110	Prepare and maintain written operating instructions and a record with the dates, amounts, and types of waste treated for 3 years.	[CE] HSC 25201.5(d)(3,5) [CA] HSC 25200.3(c)(6,7)	134	Prepare/submit an annual report as requested by the CUPA.	[PBR] CCR 67450.3(c)(10)
			135	Provide a written closure plan.	[PBR] CCR 67450.3(c)(8)(G)
111	Test ancillary equipment of treatment tanks or containers every two years if there is no secondary containment.	[CE] HSC 25201.5(e)(1) [CA] HSC 25200.3(c)(4)	136	Remove hazardous waste within 90 days of treatment of the final volume.	[PBR] CCR 67450.3(c)(11)(D)
			137	Complete closure activities within 180 days of final hazardous waste treatment.	[PBR] CCR 67450.3(c)(11)(E)
112	After unit is closed, remove or decontaminate all waste residues and systems, soils, etc., contaminated with hazardous waste. Provide written notification upon completion of closure activities.	[CE] HSC 25201.5(d)(8) [CA] HSC 25200.3(g)	138	Notify the CUPA 15 days before the completion of closure.	[PBR] CCR 67450.3(c)(11)(F)
			139	Submit a closure certification signed by the owner/operator and a professional engineer.	[PBR] CCR 67450.3(c)(11)(G)

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#131. Revise and update the Waste Water Treatment Operating Instruction/Treatment Process to indicate the current waste streams being treated and the treatment methods being used at this facility. Ensure treatment processes that are no longer utilized such as metal precipitation and container rinsing are eliminated from the waste treatment process/operating instruction.

Inspected By: Gary To, HMS II	Consent Given By: William (Bruce) Byrd Pascale Saliba	Authorized Representative's Signature: US Mail
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LA County Fire Department
COMPLAINT FORM

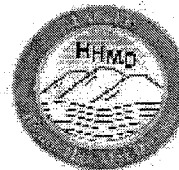
Report # : 5602

Entered By : EE0000560 - RAYA, MONICA

V100304

DATE: September 25, 2012

FROM: EE0000560 - RAYA, MONICA
HHMD



COMPLAINT ID: CO0023958

FA0003683 - GENERAL TESTING AND INSPECTION INC

OWNER INFORMATION

OW0031990 - MISTRAS GROUP INC

DBA : GENERAL TESTING AND INSPECTION INC

Site Address : 8427 ATLANTIC AVE
CUDAHY, CA 90201

Mailing Address: 8427 ATLANTIC AVE
CUDAHY,

Phone:

FACILITY INFORMATION

FA0003683 - GENERAL TESTING AND INSPECTION INC

Location :

Site Address : 8427 ATLANTIC AVE
CUDAHY, CA 90201

Mailing Address: 8427 ATLANTIC AVE
CUDAHY, CA 90201

Phone: 1st: 323-583-1653

COMPLAINT ID NUMBER: CO0023958

Service Code: _____

Action Code: _____

Result Code: _____

COMPLAINT MODE : OTHER HHMD REFERRAL

District : C

SOURCE OF REQUEST:

Complainant: Complainant Not Specified

Address: Address Not Specified

Home/Cell Phone : Phone Not Specified

Work Phone: Phone Not Specified

Email Address :

DESCRIPTION: *(Please clearly describe the changes / corrections.)*

STATUS : 50 - INACTIVE

NON-RESPONDER TP/PBR COMPLAINT REFERRAL

9/20/12 Per BYU, this facility has not submitted the required 2012 Tiered Permit documents and is now on the Permit by Rule (PBR) Non-Responder list.

Complaint investigation will require either: (1) Site visit if facility is due for an inspection, OR (2) Telephone call to obtain original documents for the annual Tiered Permit PBR renewal. (Facility may be treating hazardous waste illegally without authorization.) It is a Class I violation for facilities with a Closure Cost Estimate (CCE) greater than 10K, and without a Financial Assurance mechanism on file, to operate a Tiered Permit unit. *Annual Inflation factor of 1.024 to be used for the CCE.*

After this Complaint has been addressed by inspector, (and CLOSED by District STC) please make copies for your DISTRICT files and forward all ORIGINAL documents along with a copy of the CLOSED complaint to the West District office for TP record keeping. When West District receives original documents, the TP coordinator will review documents for completeness, and issue an authorization letter to facility. *No documents are being forwarded from West District.* MRAYA

09/25/12 PER INSP GARY TO: THIS FACILITY WAS TAKEN OUT OF TP ON 10/18/11. THEREFORE, NOT REQUIRED TO SUBMIT ANNUAL TP PACKET. COMPLAINT DISMISSED.

Date / Time

Received by : EE0000560 - RAYA, MONICA

9/20/2012 07:40:22

Assigned to : EE0000156 - TO, GARY

9/21/2012 16:01:48

List dates, times, types of notices, names address and phone numbers of people involved. Describe conditions and actions taken.

** PLEASE INDICATE THE EFFECTIVE DATE NOT THE SITE VISIT DATE**